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16 *Interim Co-Lead Class Counsel*

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18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 SAN JOSE DIVISION

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22 *IN RE: ZOOM VIDEO COMMUNICATIONS*  
23 *INC. PRIVACY LITIGATION,*

Master Case No. 5:20-cv-02155-LHK

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO EXTEND CASE DEADLINES**

24 This Documents Relates To:  
25 All Actions //

**STIPULATION**

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs and Defendant Zoom Video Communications, Inc. (“Zoom”) (collectively, “the Parties”), by and through their attorneys of record, hereby stipulate as follows:

WHEREAS, the Parties are engaged in continued mediation before the Hon. Jay C. Gandhi (Ret.), which began in November 2020;

WHEREAS, by Stipulation submitted to this Court on April 7, 2021 (ECF No. 176) and granted by this Court on April 8, 2021 (ECF No. 177) (“April Stipulation”), the Parties reported to the Court that they had reached agreement on certain material terms of a settlement and intended to complete settlement negotiations, finalize the details of a settlement, formally memorialize the settlement, and present the settlement to the Court for approval as expeditiously as possible;

WHEREAS, since the April Stipulation, the Parties have worked diligently to complete their discovery and settlement negotiations and finalize and memorialize a settlement, including through a full-day mediation session with Judge Gandhi on April 21, 2021 and ongoing conferral about targeted discovery;

WHEREAS, since the April 21 mediation session, the Parties have continued to negotiate the remaining material terms of a settlement and, having made substantial progress expect to conclude those negotiations shortly;

WHEREAS, pursuant to the April Stipulation, Plaintiffs’ deadline to file a Second Amended Complaint (“SAC”) is currently set for May 12, 2021 (“the SAC deadline”);

WHEREAS, on February 23, 2021, the Court approved the Parties’ stipulation extending the deadline for Plaintiffs to file for class certification and extending related deadlines (ECF No. 162);

WHEREAS, also on February 23, 2021, the Court continued the Further Case Management Conference scheduled for February 24, 2021 to May 19, 2021 and ordered that a Joint Case Management Statement be filed by May 12, 2021 (ECF No. 163);

WHEREAS, on March 23, 2021, the Parties stipulated that Zoom’s deadline to answer the First Amended Consolidated Class Action Complaint (“FAC”) is 21 days after the deadline for

Plaintiffs to file a Second Amended Consolidated Class Action Complaint (“SAC”) has expired (ECF No. 169);

WHEREAS, on April 8, 2021, the Court granted the April Stipulation as described above;

WHEREAS, the instant stipulation is jointly submitted by the Parties to extend the deadline for Plaintiffs to file a SAC and to defer the upcoming Case Management Statement and Conference in light of the Parties substantial progress toward finalizing a settlement agreement to be presented to the Court with a motion for preliminary approval;

NOW THEREFORE, Plaintiffs and Zoom through their respective counsel, pursuant to Civil Local Rules 6-2 and 7-12, and subject to the Court’s approval, hereby stipulate as follows:

1. Plaintiffs’ SAC deadline is extended to June 9, 2021;
2. The Further Case Management Conference scheduled for May 19, 2021 and the Joint Case Management Statement deadline of May 12, 2021 are taken off calendar pending further Order of the Court;
3. All other deadlines shall remain the same.

IT IS SO STIPULATED.

Dated: May 11, 2021

ADHOOT & WOLFSON, PC

By: /s/ Tina Wolfson  
Tina Wolfson (174806)

Interim Co-Lead Counsel

Dated: May 11, 2021

COTCHETT, PITRE & MCCARTHY LLP

By: /s/ Mark C. Molumphy  
Mark C. Molumphy (168009)

Interim Co-Lead Counsel

1 Dated: May 11, 2021

COOLEY LLP

2  
3 By: /s/ Michael G. Rhodes  
4 Michael G. Rhodes (116127)

5 Attorneys for Defendant  
6 ZOOM VIDEO COMMUNICATIONS, INC.  
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8 **FILER ATTESTATION**

9 I, Michael G. Rhodes, attest that concurrence in the filing of this document has been  
10 obtained from the other signatories. Executed on May 11, 2021, in San Francisco, California.

11  
12 /s/ Michael G. Rhodes  
13 Michael G. Rhodes  
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**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IS SO ORDERED

Dated: \_\_\_\_\_

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Hon. Lucy H. Koh  
United States District Judge

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